

EXHIBIT # E

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”)
an individual,
Kenneth Petty, AKA (“Zoo”),
an individual

Defendants.

Declaration of Mrs. Gordon

Civil Action No. 21-cv-4568

I, **Mrs. Gordon**, hereby declare pursuant to 28 U.S.C. §1746 the following:

1. I submit this Declaration in Response to inflammatory, irrelevant and malicious allegations made by Plaintiff Jennifer Hough’s (“Hough”) Counsel, Tyrone A. Blackburn (“Blackburn”), against my husband, Steven N. Gordon (“Steven”), in his Declaration in Opposition (the “Blackburn Declaration”) to Former Defendant Onika Tanya Maraj’s (“Maraj”) Motion for Sanctions against Blackburn pursuant to 28 U.S.C. § 1927 and the Court’s Inherent Power (*See* ECF 62 Briefing Schedule for such Motion) (the “Motion for Sanctions”).
2. I have personal knowledge of all facts stated herein.
3. I unequivocally deny using the words “drug addiction” in the context of my husband, Steven, with Mr. Blackburn.
4. I have never discussed, named, nor associated my husband, Steven, with any type of drug use in any conversation with Mr. Blackburn.
5. I did not state to Mr. Blackburn, at any time, that my husband, Steven, had an alleged “drug addiction which has had any impact on my life, nor the lives of any of our family members.

6. At no point did I ever state or imply that Mr. Gordon had an alleged drug addiction at the time he joined Mr. Blackburn as co-counsel, in October 2021, nor at any time throughout the duration of their co-representation in this matter. Any statements to the contrary are entirely false.

7. With respect to a November 2021 comment that I posted on YouTube, Steven did not – nor did I ever imply to Mr. Blackburn – impersonate me by accessing my YouTube account to post same.

8. The statements made by Mr. Blackburn in paragraphs 4, 5, 6, 7 and 20 of his declaration are wholly untrue and not representative of any facts.

9. Although Mr. Blackburn attempts to use a footnote to imply that I gave my consent and/or advised him of such “facts”, I did not have these conversations with him nor did I give him permission to fabricate this story.

10. With respect to the remainder of Mr. Blackburn’s accusations against Steven, I refer the Court to the Declaration of Steven N. Gordon.

I declare under penalty of perjury that the preceding is true and correct.

Executed on April 6, 2022

Mrs. Gordon

Mrs. Gordon